



DEPARTMENT OF THE NAVY

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> 5000-33C Ser BPMOW.gc/010 January 11, 2019

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Ms. Patricia Hannon
California Regional Water Quality Control Board, Santa Ana Region
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(Submitted via GeoTracker upload)

Fellow Base Realignment and Closure Cleanup Team (BCT) Members:

SUBJECT: DRAFT FINDING OF SUITABILITY TO TRANSFER (FOST) #10 FOR

CARVE-OUTS II-D-2, II-F-2, II-V-2, and III-B-3, FORMER MARINE CORPS

AIR STATION (MCAS) EL TORO, IRVINE, CALIFORNIA

The U.S. Department of the Navy (Navy) is forwarding for your review a copy of the subject document (Enclosure 1), which summarizes how the requirements and notifications for hazardous substances, petroleum products, and other regulated materials within Carve-Outs II-D-2, II-F-2, II-V-2, and III-B-3 have been satisfied and that the properties are environmentally suitable for transfer. This is the last anticipated FOST for Former MCAS El Toro. The remaining Navy-owned property, consisting of a portion of Installation Restoration Program (IRP) Site 1 (Explosive Ordnance Disposal Training Range), is planned for Federal-to-Federal transfer to the U.S. Department of Justice, Federal Bureau of Investigation, in Fiscal Year 2020; this property was addressed in the *Draft Environmental Summary Document for IRP Site 1* (January 2017), which is currently being finalized. The Navy respectfully requests BCT concurrence (or comments, if any) on Draft FOST #10 by **March 15, 2019**.

Operating Properly and Successfully (OPS) Determination for IRP Sites 1 and 2 Groundwater

5000-33C Ser BPMOW.gc/010 January 11, 2019

The Navy is anticipating receipt of a letter from the U.S. Environmental Protection Agency (U.S. EPA) regarding its determination that the remedies for IRP Sites 1 and 2 groundwater are OPS. All three regulatory agency members of the BCT have approved the *Final OPS Demonstration Report, Groundwater at IRP Sites 1 and 2* (AECOM-Envirocon Joint Venture, April 2018), and the U.S. EPA's OPS determination letter is the only outstanding document needed to finalize the FOST. The Navy has had several discussions with U.S. EPA over the past 8 months regarding the OPS determination and expects that the OPS determination letter will be issued soon after the resolution of the partial government shutdown.

Per- and Polyfluoroalkyl Substances (PFAS) in Groundwater

Although PFAS have not been designated as hazardous substances under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Navy has included a discussion of its recent investigations to determine the presence or absence of PFAS in basewide groundwater in Draft FOST #10 (see Sections 4.1, 4.2.3.3, 4.2.3.8, and 6.2). Because there are currently no promulgated regulatory standards for PFAS, the Navy proposes a notification regarding the presence of PFAS in groundwater underlying portions of Carve-Out III-B-3 at concentrations greater than non-promulgated screening levels. The Navy is planning on collecting additional groundwater samples from Carve-Out III-B-3 (among other locations) in March 2019 for PFAS analysis to further assess impacts. The BCT will be provided an opportunity to review and comment on the proposed sampling locations before mobilization. As the Navy proceeds with the FOST and PFAS sampling effort in parallel, it will appropriately address new information in consultation with the BCT.

The Navy appreciates your continued support of the ongoing environmental activities at Former MCAS El Toro. Please provide your concurrence (or comments, if any) on Draft FOST #10 by **March 15, 2019.** Should you have any questions regarding the document or the Navy's plans for additional PFAS sampling, please contact Mr. Guy Chammas, Lead Remedial Project Manager, at (619) 524-5922.

Sincerely,

ERICA L. SPINELLI

Base Closure Manager (Acting)

Erica L Spirell

By direction of the Director

Enclosure: 1. Draft Finding of Suitability to Transfer #10 for Carve-Outs II-D-2, II-F-2, II-V-2, and III-B-3, Former Marine Corps Air Station El Toro, Irvine, California.

January 2019

Copy to: (next page)

5000-33C Ser BPMOW.gc/010 January 11, 2019

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